

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

**JOSEPH HOBBS AND DRAKE FEENEY,
individually and on behalf of all
others similarly situated,** §
§
§
§
§
§
Plaintiffs, §
§
§
§
§
§
vs. §
§
§
§
§
§
**PETROPLEX PIPE AND
CONSTRUCTION, INC.,** §
§
§
§
§
§
Defendant. §
§
§
§
§
§
CIVIL ACTION NO. 7:17-CV-030
Jury Demanded

**DEFENDANT'S OBJECTIONS AND RESPONSES
TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION**

TO: Plaintiffs, Joseph Hobbs and Drake Feeney, by and through their attorney of record, Chris R. Miltenberger, THE LAW OFFICE OF CHRIS R. MILTENBERGER, PLLC, 1340 N. White Chapel, Suite 100, Southlake, Texas 76092.

COMES NOW, Defendant Petroplex Pipe and Construction, Inc., (“Petroplex” or Defendant”), and pursuant to Texas Rule of Civil Procedure 196, hereby serves Defendant’s Objections and Responses to Plaintiffs Joseph Hobbs and Drake Feeney’s (“Plaintiffs” or “Hobbs”) First Request for Production.

OBJECTIONS AND RESPONSES

REQUEST NO. 1: Produce each and every document identified in your responses to the interrogatories in the Plaintiffs' First Set of Interrogatories to Defendant promulgated on Defendant contemporaneously herewith and/or which relate to your answers to such interrogatories or upon which you relied or reviewed, consulted or referred to in answering such interrogatories.

RESPONSE: Other than as already produced herein, Defendant has no documents responsive to this Request.

REQUEST NO. 27: Produce all statements of witnesses, potential witnesses, or persons interviewed in connection with this case.

RESPONSE: To the extent this Request seeks information that is work product and/or core work product, Defendant asserts the work-product privilege. Subject to the foregoing assertion of privilege, Defendant has no documents responsive to this Request.

REQUEST NO. 28: Produce all documents reviewed, relied upon, considered, or created by expert(s) to testify at trial.

RESPONSE: Defendant has no documents responsive to this Request.

REQUEST NO. 29: Produce all documents obtained pursuant to subpoena, release, or authorization relating to this case.

RESPONSE: Defendant has no documents responsive to this Request.

REQUEST NO. 30: Produce all safety meeting sign-in sheets for any safety meetings attended by any of the Plaintiffs.

RESPONSE: See responsive documents attached hereto as Exhibit E.

REQUEST NO. 31: Produce all job safety analysis reports, work permits, work performance reports, project instructions, project outlines, or any other documentation regarding or related to the performance of any specific welding or other work done or to be done by any of the Plaintiffs.

RESPONSE: Defendant has no documents responsive to this Request.

REQUEST NO. 32: Produce all invoices and/or other documents evidencing, relating to or regarding Defendant's charges to its customers for work done by each Plaintiff during the Relevant Time Period.

RESPONSE: Defendant objects to this Request on the grounds it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 33: Produce all documents showing mileage reimbursement/payment to any of the Plaintiffs for work performed out in the field as opposed to in the Midland Yard itself.

RESPONSE: Defendant has no documents responsive to this Request.

REQUEST NO. 34: Produce all contracts or agreements between Defendant and any of the Plaintiffs regarding services/work to be performed by any of the Plaintiffs.

RESPONSE: Defendant has no documents responsive to this Request.

Respectfully submitted,

SIMON | PASCHAL PLLC
13601 Preston Road, Suite W870
Dallas, Texas 75240
(972) 893-9340 Telephone
(972) 893-9350 Facsimile

By: /s/ Paul W. Simon

Paul W. Simon
State Bar No. 24060611
paul@simonpaschal.com
Dustin A. Paschal
State Bar No. 24051160
dustin@simonpaschal.com

AND

Jason B. Freeman
TX Bar # 24069736
Freeman Law, PLLC
2595 Dallas Parkway, Suite 420
Frisco, Texas 75034
Telephone: [214.984.3410](tel:214.984.3410)
Fax: [214.984.3409](tel:214.984.3409)
Jason@freemanlaw-pllc.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2017, a true and correct copy of the foregoing instrument was served on all parties via e-mail as follows:

Chris R. Miltenberger
THE LAW OFFICE OF CHRIS R. MILTENBERGER, PLLC
1340 N. White Chapel, Suite 100
Southlake, Texas 76092
F: (817) 416-5062

/s/ Paul W. Simon
Paul W. Simon